

EXHIBIT “A”

IN THE MATTER OF THE
APPLICATION TO SEARCH

SUPERIOR COURT OF NEW JERSEY
COUNTY OF SALEM

PROPERTY:

615 EAST MAIN STREET
APARTMENT C-21
BLOCK 85 LOT 2
MAPLE SHADE, NEW JERSEY 08052

CRIMINAL

SEARCH WARRANT

To Detective II D. Quinn, badge number 6424, New Jersey State Police, and any officers of the New Jersey State Police or any officer of any department having jurisdiction.

1) THINGS TO BE SEIZED:

This matter having being opened to the court by Detective II D. Quinn, badge number 6424, on the application for the issuance of a search warrant for the:

(X) Premises listed below

() Vehicle(s) listed below

() Person(s) listed below

() Property listed below

and the court having reviewed:

(X) Affidavit of

() Testimony under oath of

said Detective II D. Quinn, badge number 6424, and being satisfied that located therein or thereon there is:

Evidence relating to the offenses of, Murder {N.J.S.A. 2C:11- 3A}, Aggravated Assault with Bodily Injury {N.J.S.A. 2C:12-1B} and Possession of Weapon for Unlawful Purpose {N.J.S.A. 2C:39-5D} is located within the aforementioned property. This affiant therefore respectfully requests that a search warrant be issued authorizing a search of the above described location for evidence,

including but not limited to: photographs, written or electronically stored documents, computers, cell phones, paperwork or physical evidence including but not limited to clothing, personal items, photographs, video or any evidence relating to the aforementioned crimes or relating to the ongoing relationship between Carole Brown and Frank MaClaine. Additionally, I request authorization to collect anything inside the residence suggesting Frank MaClaine planned or anticipated Carole Brown's death. I also request to collect any and all items which at the time of their discovery are reasonably believed to be evidential or relevant to the aforementioned investigation.

2) AUTHORITY TO SEARCH: SERVE ONE COPY OF WARRANT:

You are commanded to search the:

- ☐ Premises listed below
- ☐ Vehicle(s) listed below
- ☐ Person(s) listed below
- ☒ Property listed below

and to serve a copy of this warrant on such person or on the person in charge or control of such premises, vehicle, person, or property.

3) DELIVER RECEIPT OF ITEMS SEIZED:

You are hereby ordered in the event you seize any of the above described articles, to give a receipt for the property so seized to the person from whom it was taken or in whose possession it was found, or in the absence of such person to leave a copy of this warrant together with such receipt in or upon the said premises or vehicle(s) from which the property was taken.

4) TIME WHEN SEARCH CAN BE CONDUCTED, INVENTORY TO JUDGE:

You are further authorized to execute this warrant within ten (10) days from the issuance hereof:

☒ (X) Between the hours of 6 AM and 10 PM

☐ () Anytime

and thereafter to forthwith make a prompt return to me with a written inventory of the property seized under the authority of this warrant.

5) SPECIFIC DESCRIPTION OF THE PROPERTY TO BE SEARCHED.

The following is a description of the:

☐ () Premises listed below

☐ () Vehicle(s) listed below


☐ () Person(s) listed below

☒ (X) Property listed below

To be searched:

THE RESIDENCE OF FRANK MACLAINE 615 EAST MAIN STREET
APARTMENT C-21 MAPLE SHADE, NJ 08052 (BLOCK 85, LOT # 2)
THE BUILDING IS DESCRIBED A THREE STORY BRICK STRUCTURE
CONSISTING OF INDIVIDUAL APARTMENTS. SPECIFICALLY C-21 IS CLEARLY
MARKED IN THE MIDDLE OF THE DOOR.

GIVEN AND ISSUED UNDER MY HAND AT 4:20 PM, this 17th
day
of November, 2011.


TIMOTHY G. FARRELL, JSC

Judge of the Superior Court

Salem County

IN THE MATTER OF THE
APPLICATION TO SEARCH:

SUPERIOR COURT OF NEW JERSEY
COUNTY OF SALEM

PROPERTY:
615 EAST MAIN STREET
APARTMENT C-21
BLOCK 85 LOT 2
MAPLE SHADE, NEW JERSEY 08052

CRIMINAL

STATE OF NEW JERSEY)
 SS
COUNTY OF SALEM)

APPLICATION FOR
SEARCH WARRANT

I, Detective H.D. Quinn, badge number 6424, of full age, being duly sworn on his oath
according to law, depose and says:

1) QUALIFICATIONS OF APPLICANT:

I am presently assigned to the Criminal Investigation Office and have been a member of the New Jersey State Police for approximately seven (7) years. In addition to graduating from the New Jersey State Police Academy in September of 2004, I have attended numerous courses, seminars, training sessions, and lectures regarding criminal investigation techniques and procedures, as well as the practices and methods of operation employed by individuals engaged in various types of criminal activity including Arson. I have further been involved with investigations requiring the interdiction of individuals and groups engaged in such criminal activity. I have participated in over two hundred (200) investigations involving arson, burglary, narcotic and weapons trafficking. The aforementioned investigations have resulted in numerous arrests and convictions. I have engaged in search warrants in which illegal contraband has been

seized. Additionally, I have been called to testify in various prosecutions within the State of New Jersey resulting in convictions of defendants for violations of the New Jersey Criminal Statutes. I have been involved in numerous criminal investigations which have involved the crimes of Arson, Criminal Attempt Homicide, Weapons Offenses, Aggravated Assault, Robbery, Terroristic Threats, Burglary, Theft, Receiving Stolen Property, Bad Checks, Fraud, Possession / Distribution / Manufacture of Controlled Dangerous Substances, and Conspiracy to commit various criminal offenses.

2) BRIEF DESCRIPTION OF WHAT IS TO BE SEARCHED:

I want to search of the following:

(X) Premise at:

() Vehicle(s) of:

() Person(s) of:

() Property:

**THE RESIDENCE OF FRANK MACLAINE 615 EAST MAIN STREET
APARTMENT C-21 MAPLE SHADE, NJ 08052 (BLOCK 85, LOT # 2)**

3) SPECIFIC DESCRIPTION OF THE PROPERTY TO BE SEARCHED:

The property is specifically described as:

1) THE RESIDENCE OF FRANK MACLAINE 615 EAST MAIN STREET

APARTMENT C-21 MAPLE SHADE, NJ 08052 (BLOCK 85, LOT # 2)

2) THE BUILDING IS DESCRIBED A THREE STORY BRICK STRUCTURE

CONSISTING OF INDIVIDUAL APARTMENTS. SPECIFICALLY C-21 IS

CLEARLY MARKED IN THE MIDDLE OF THE DOOR.

4) SPECIFIC DESCRIPTION OF WHAT IS TO BE SEIZED:

I believe probable cause exist for a complete search of the residence located at 615 East Main Street, Apt C-21 Maple Shade, NJ 08052, Block 85, Lot # 2 (the residence of Frank E. MaClaine). I have reason to believe and do believe that evidence relating to the offenses of, **Murder {N.J.S.A. 2C:11- 3A}, Aggravated Assault with Bodily Injury {N.J.S.A. 2C:12-1B} and Possession of Weapon for Unlawful Purpose {N.J.S.A. 2C:39-5D}** is located within the aforementioned property. This affiant therefore respectfully requests that a search warrant be issued authorizing a search of the above described location for evidence, including but not limited to: photographs, written or electronically stored documents, computers, cell phones, paperwork or physical evidence including but not limited to clothing, personal items, photographs, video or any evidence relating to the aforementioned crimes or relating to the ongoing relationship between Carole Brown and Frank MaClaine. Additionally, I request authorization to collect anything inside the residence suggesting Frank MaClaine planned or anticipated Carole Brown's death. I also request to collect any and all items which at the time of their discovery are reasonably believed to be evidential or relevant to the aforementioned investigation.

I believe that probable causes exists to search the residence located at 615 East Main

Street, Apt C-21 Specifically the residence of Maple Shade, NJ 08052, Block 85, Lot # 2 (the residence of Frank E. MacLaine). This location potentially has evidence contained within.

Frank E. MacLaine currently resides at this residence. It is not uncommon for the aforementioned to have records / documents at his home. This affiant therefore respectfully requests that a search warrant be issued authorizing a search of the above described location, to obtain evidence described in the previous paragraph.

5) PROBABLE CAUSE:

The facts supporting this application are as follows:

A. At 11:15 P.M., the Woodstown Station received a telephone call from the Salem County Hospital in regards to a patient. Carole A. Brown (Date of Birth: May 8, 1938, SSN: 155-28-3903) was brought to the Emergency Room by Frank MacLaine (Date of Birth: March 6, 1946, SSN: 165-48-3453). Frank MacLaine drove Carole Brown to the hospital, operating Carole Brown's vehicle (2006 Hyundai Tucson, bearing Pennsylvania registration YHH13B). Carole Brown had severe blunt force trauma to the back side of her head. Carole Brown was treated by Dr. Woik, but was pronounced deceased at 11:25 P.M. Carole was transported to Underwood Memorial Hospital, pending an autopsy.

B. Trooper B. Bobbitt, badge number 6343, and Trooper M. Liccketto, badge number 7124, responded to the Salem County Hospital to investigate. Trooper Bobbitt encountered Frank MacLaine sitting in a wheelchair in the hallway of the Emergency Room. Frank MacLaine told Trooper Bobbitt that he was visiting his girlfriend,

Carole Brown, at her apartment. At some point in the evening, Carole Brown drove to the "Corner Bar" in Woodstown to "buy drugs". When she didn't return after an hour, Frank MacLaine claimed that he walked to the "Corner Bar" to look for her and observed her vehicle parked in the "Corner Bar" parking lot. Frank MacLaine indicated that he saw Carole Brown slumped over, sitting in the passenger seat of the vehicle. He opened the passenger door, shook Carole, and asked her "if she was okay". Carole did not respond. Frank MacLaine indicated that he assumed control of the vehicle and drove her to the Salem County Hospital.

C. Detective II E. Crain, badge number 6296, of the New Jersey State Police/Crime Scene Unit, responded to the hospital and photographed Carole Brown's Hyundai Tucson. In plain view, through the vehicle's windows, Detective Crain observed evidence of an assault. Located throughout the passenger cabin was pools of blood, high velocity blood spatter, brain matter, and bone fragments. Consequently, the vehicle was secured and towed to Troop "A" Headquarters, pending the application of a search warrant.

D. Detective II D. Quinn, badge number 6424, responded to the Carole Brown's apartment (160 West Avenue, Apartment E 714, Woodstown, New Jersey). Frank MacLaine's vehicle (Ford Taurus, PA Registration HSL2233) was parked haphazardly in a parking stall in front of her apartment. The vehicle had impact damage, which appeared to have been recent, to the lower portion of the vehicle's passenger door.

E. During a neighborhood canvass, Trooper B. Guinup, badge number 6728 interviewed Carole Brown's neighbor (Anna G. Pansena, Date of Birth: August 18, 1934; 160 West Avenue, Apartment 715, Woodstown, New Jersey). Anna Pansena stated that Frank Maclain is a long time "good friend" of Carole Brown. Anna recalled going to bed at approximately 10:15 P.M. Before doing so, Anna heard Carole "talking loud" at the rear of her vehicle, which was very uncharacteristic of Carole. Anna described Carole as being very soft spoken. Anna assumed Carole was speaking to Frank MacLaine, but was not certain. A few minutes after hearing the loud conversation, Anna looked outside of her window a second time and noticed Carole's vehicle was no longer there. Only Frank MacClaine's vehicle remained. Frank MacLaine's vehicle (2005 Ford Taurus, bearing Pennsylvania registration HSL2233) was secured and towed to Troop "A" Headquarters, pending the application of a search warrant.

F. I telephoned Carole Brown's next of kin, and ex-husband, George Brown Jr. (874 White Oak Road, Manheim, Pennsylvania 17545). I contacted George Brown to notify him of Carole's death and glean background information. George Brown explained that he and Carole have been divorced for approximately 25 years. George indicated that he does not stay intimately involved in her daily life, but they remain in sporadic contact. They last spoke approximately one month ago. In regards to past or recent boyfriends, George stated that Carole had a relationship with a guy name "Frank" intermittently over the last 20 years. George could not independently recall

“Frank’s” last name, but when offered the last name “MacLaine”, George stated, “yeah, that’s it”. George added that Carole has complained in the past that Frank was stalking her and that she (Carole) was afraid of him (Frank). George believed that Frank was attempted to reignite a relationship with Carole, however, she was not interested.

G. Frank MacLaine was transported to the Woodstown Station for further investigation. Frank MacLaine’s clothes were covered in blood. Permeated throughout his jacket, shirt, pants, and boots were smears and droplets of blood. Frank MacLaine’s hands were blood soaked, and blood spatter was observed on his face and forehead. At the time Frank MacLaine was transported the Woodstown Station, he was extremely intoxicated and not suitable for an interview.

H. Frank MacLaine was later formally interviewed and charged. During the interview process, Mr. MacLaine advised that he currently resides at 615 East Main Street, Apt. C-21, Block 85, Lot # 2 Maple Shade New Jersey 08052.

I. On November 16th 2011, I received a phone call from George Brown III, the son of Carole Brown, who advised that while searching his mother’s residence he discovered a life insurance policy in his mother’s name with Mutual Insurance of Omaha for \$25,000.00. The policy was taken out in July 2011 with Frank MacLaine listed as the beneficiary. Mr. Brown felt after looking at the signature on the paperwork it was not

his mothers. Mr. Brown believes that the signature on the insurance paperwork may have been forged.

Based on my training, experience and the facts recited in this application, I have reason to believe and do believe that evidence relating to the crime of **Murder** {N.J.S.A. 2C:15-1}, **Possession of a Weapon for an Unlawful Purpose** {N.J.S.A. 2C:39-4}, **Possession of CDS/Heroin** {N.J.S.A. 2C:35-10a.1}, and **Possession of CDS Paraphernalia** {N.J.S.A. 2C:36-2}, is located in the 615 East Main Street, Apt Maple Shade, NJ 08052, Block 85 Lot # 2 (the residence of Frank E. MacLaine).

6) TIME WHEN SEARCH CAN BE CONDUCTED:

I hereby request that the warrant be executed within ten (10) days from the issuance between the hours of 6:00 A.M. and 10:00 P.M.. Therefore, I respectfully request permission be granted for the search and seizure of the vehicle listed in the aforementioned document.

Det # 02-2 AC424

Detective II D. Quinn #6424
New Jersey State Police
Troop "A" Criminal Investigation Office
Woodstown Station

Sworn and subscribed before me this

67th day of November, 2011.


TIMOTHY G. FARRELL, JSC

Judge of the Superior Court,
assigned in and to the County of Salem,
State of New Jersey.